

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

DONNA CURLING, *et al.*

*Plaintiffs,*

v.

BRAD RAFFENSPERGER, *et al.*,

*Defendants.*

CIVIL ACTION FILE

NO. 1:17-CV-2989-AT

**NOTICE OF FILING TO CLARIFY STATE DEFENDANTS'  
RESPONSE TO 30(b)(6) ISSUE, [DOC. 1351]**

State Defendants submit this notice filing at Curling Plaintiffs' request.

State Defendants filed a one-page response this week to the Court's request for their position on the 30(b)(6) issue raised in opposing counsel's March 17, 2022 email to the Court. [Doc. 1351]. In no time after State Defendants filed their response, however, Curling Plaintiffs' counsel sent an email arguing that the filing was incorrect regarding Curling Plaintiffs' identification of the 30(b)(6) topics. Instead, counsel pointed to an email from two weeks earlier as purporting to identify every 30(b)(6) topic:

I wrote you and your colleagues on March 15: In short, we did not receive the information we are entitled to on any of the topics agreed to for the rule 30b6 deposition.'

A copy of the email from Curling Plaintiffs' counsel is attached as Ex. A. For the Court's reference, a copy of the March 15 email is provided as Ex. B.

Due to the broad scope of topics in Plaintiffs' 30(b)(6) deposition notice to the Secretary of State's office, which included 18 topics and 27 subtopics,<sup>1</sup> counsel believed Curling Plaintiffs would be identifying discrete topics that they were supposedly unable to obtain testimony on from a prepared witness. It is now understood that the above sentence from Curling Plaintiffs' March 15 email was intended to be their identification of *all* 30(b)(6) topics and subtopics.

Respectfully submitted this 31st day of March 2022.

/s/ Vincent R. Russo  
Vincent R. Russo  
Georgia Bar No. 242628  
vrusso@robbinsfirm.com  
Josh Belinfante  
Georgia Bar No. 047399  
jbelinfante@robbinsfirm.com  
Carey A. Miller  
Georgia Bar No. 976240  
cmiller@robbinsfirm.com  
Alexander Denton  
Georgia Bar No. 660632  
adenton@robbinsfirm.com

---

<sup>1</sup> A copy of Plaintiffs' Notice of 30(b)(6) Deposition to State Defendants is attached as Ex. C.

Robbins Alloy Belinfante Littlefield LLC  
500 14th Street, N.W.  
Atlanta, Georgia 30318  
Telephone: (678) 701-9381

Bryan P. Tyson  
Georgia Bar No. 515411  
btyson@taylorenglish.com  
Jonathan D. Crumly  
Georgia Bar No. 199466  
jcrumly@taylorenglish.com  
James A. Balli  
Georgia Bar No. 035828  
jballi@taylorenglish.com  
Diane F. LaRoss  
Georgia Bar No. 430830  
dlaross@taylorenglish.com  
Bryan F. Jacoutot  
Georgia Bar No. 668272  
bjacoutot@taylorenglish.com  
Loree Anne Paradise  
Georgia Bar No. 382202  
lparadise@taylorenglish.com  
TAYLOR ENGLISH DUMA LLP  
1600 Parkwood Circle, Suite 200  
Atlanta, Georgia 30339  
Telephone: 678-336-7249

*Counsel for State Defendants*

**L.R. 7.1(D) CERTIFICATION**

I certify that this Notice of Filing has been prepared with one of the font and point selections approved by the Court in Local Rule 5.1(C). Specifically, this Response has been prepared using 13-pt Century Schoolbook font.

*/s/ Vincent R. Russo*  
Vincent R. Russo